ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	
	)	
Telocator Petition For	)	RM - 7617
Rulemaking to Amend Part 22 of	)	
the Commission's Rules Concerning	)	
the Use of 930-931 MHz For An	)	
Advanced Messaging Service	)	

COMMENTS OF THE
LAND MOBILE COMMUNICATIONS COUNCIL

The Land Mobile Communications Council ("LMCC") submits its comments in support of the above-captioned Petition for Rulemaking filed by Telocator on January 23, 1991.[1] In its Petition, Telocator requests the Commission to release the 930-931 MHz advanced paging reserve band for a new generation of communications services denominated "Advanced Messaging Services" ("AMS").

I. INTRODUCTION

1. LMCC is a non-profit association of organizations representing users of land mobile radio and providers of land mobile services and equipment. LMCC is dedicated to securing and maintaining sufficient allocation of radio frequencies for all of the land mobile services -- both private and common carrier. LMCC acts on behalf of the vast majority of

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[1] Telocator Petition For Rulemaking to Amend Part 22 of the Commission's Rules Concerning the Use of 930-931 MHz for an Advanced Messaging Service, (Jan. 23, 1991); see P.N. Report No. 1836 (Feb. 7, 1991).

public safety, business, industrial, land transportation, private and common carrier land mobile radio users, as well as a diversity of land mobile service providers and equipment manufacturers on a wide variety of communications issues.[2] Consistent with its purpose, LMCC has been an active participant in every Commission spectrum allocation proceeding affecting the Land Mobile Radio community.

2. Telocator, in its Petition, asks the Commission to initiate a rulemaking proceeding that would, if ultimately adopted, permit use of the frequency band 930-931 MHz for AMS. AMS would allow a variety of creative and

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[2] A list of LMCC's membership includes:

American Association of State Highway and Transportation Officials
American Automobile Association
American Petroleum Institute
American SMR Network Association, Inc.
American Trucking Associations
Associated Public-Safety Communications Officers, Inc.
Association of American Railroads
Cellular Telecommunications Industry Association
Forest Industries Telecommunications
Forestry Conservation Communications Association
International Association of Fire Chiefs
International Association of Fish and Wildlife Agencies
International Municipal Signal Association
International Taxicab Association
Manufacturers Radio Frequency Advisory Committee
National Association of Business and Educational Radio, Inc.
National Association of State Foresters
Special Industrial Radio Service Association, Inc.
Telocator
United States Telephone Association
Utilities Telecommunication Council

technologically advanced applications -- including electronic mail, graphics and compressed voice mail services -- to be provided through a "sophisticated marriage of paging transmission systems and messaging systems." Petition at 7. In support of its request, Telocator has documented the efficiency of paging systems as a transmission method, the potential of some new AMS applications, and the need for unoccupied spectrum.

II. Release of the 930-931 MHz Band For Advanced Messaging Services Is in the Public Interest and Consistent with the Commission's Long Term Land Mobile Spectrum Planning

3. In the Commission's 1982 Order allocating 3 MHz of new spectrum for paging, it reserved the 930-931 MHz band for "advanced technology paging," stating "[w]e intend to explore potential uses of this band in another Notice to be issued in the near future."[3] Because individual operators to date have been eager to assimilate new technologies into existing systems, the age of advanced technology paging, as the Commission envisioned it in 1982, has already arrived.

4. Paging providers are now on the brink of implementing a variety of new services far beyond what was

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[3] Amendment of Parts 2 and 22 of the Commission's Rules to Allocate Spectrum in the 928-931 MHz Band and to Establish Other Rules, Policies, and Procedures for One-Way Paging Stations in the Domestic Public Land Mobile Radio Service, 89 F.C.C.2d 1337, 1342 (1982).

conceivable when the 930-931 MHz band was originally reserved. The technical parameters of such systems, including transmission speed and signalling format, however, will differ from the requirements of current paging systems. Telocator has, in fact, documented the need for new spectrum to launch AMS commercially both as a matter of operational engineering and congestion in existing paging allocations. Petition at 12-21. Consequently, the introduction of AMS is contingent upon the availability of new spectrum.

5. Although individual AMS applications themselves may have been beyond the grasp of the Commission in 1982, the framework for a natural evolution of paging was not, and the Commission wisely reserved a one megahertz band between two paging allocations for such purposes. Because this band is now necessary to continue the successful development of paging, and because the use of this band for AMS is entirely consistent with the Commission's spectrum planning for the future requirements of paging, LMCC supports allowing AMS operators access to 930-931 MHz channels.

6. LMCC also believes that the introduction of AMS will serve the public interest. The wealth of new services that can be provided combining advances in paging

transmission and digital computer technology will impact all facets of life.

7. Finally, LMCC notes that Telocator has called for a common carrier regulatory framework for AMS. The membership of LMCC is diverse and includes users and providers of both private and common carrier paging service. Individual members of LMCC recognize the needs of both private and common carrier interests for advanced paging, however. Given the makeup of the LMCC membership, LMCC takes no position as to the Commission's allocation of the frequencies.

8. In conclusion, the release of advanced technology paging reserve spectrum for AMS will have substantial benefits for the public, especially as a complement to the services currently employed by many diverse communications users. The advantages of AMS, however, will only be realized upon the release of new spectrum. Because AMS is fully consistent with both the original purpose of 930-931 MHz as a paging reserve band and the future long term spectrum planning for land mobile communications, LMCC urges the Commission to institute a rulemaking to allow the use of 930-931 MHz for AMS.

WHEREFORE, THE PREMISES CONSIDERED, the Land Mobile Communications Council respectfully urges the Federal Communications Commission to act in a manner fully consistent with the views expressed herein.

Respectfully submitted,

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March 11, 1991

CERTIFICATE OF SERVICE

I, Janet Brown, hereby certify that on this 11th day of March, 1991, I served a copy of the foregoing comments by messenger on the following parties:

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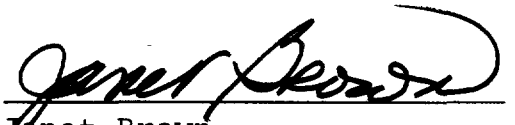

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